

REPLY TO: Columbia

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August 10, 2017

VIA ELECTRONIC FILING

The Honorable Jocelyn Boyd, Chief Clerk
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, South Carolina 29210

**Re: Frontier Communications of the Carolinas LLC Petition Requesting the
Commission's Intervention in Numbering Resources Determination for the
Jackson Rate Center And Request for Expedited Review
Our File No. 7377.00001**

Dear Ms. Boyd:

Frontier Communications of the Carolinas LLC ("Frontier") respectfully submits this request to the Public Service Commission of South Carolina ("Commission") for expedited review and waiver of the Neustar Pooling Administrator's ("PA") denial of Frontier's request for additional numbering resources to support its ability to provide reliable and adequate service to its customers.

Under federal numbering rules, a state commission may overturn the PA's decision based on the determination that the carrier has demonstrated a verifiable need for the numbering resources and has exhausted all other available remedies.¹ In its Third Report and Order in the Number Resource Optimization proceeding, the Federal Communications Commission ("FCC") concluding that "a carrier should be able to get additional number resources when there is

¹ 47 C.F.R. § 52.15(g)(4)

verifiable need due to the carrier's inability to satisfy a specific customer request."² Thus, the Commission has the authority to overturn the PA's decision in this matter.

The specific facts giving rise to Frontier's request are as follows:

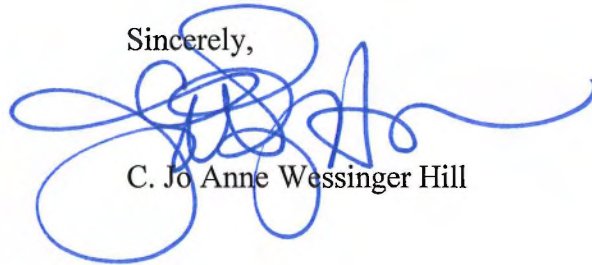
- The additional numbering resources are required to permit Frontier to provide service via a new packet switch in the Jackson rate center that is being deployed to complete projects supported by the FCC's Connect America Fund Phase II ("CAF II") and to develop a Voice over Internet Protocol ("VoIP") service in that respective LATA.
- Pursuant to the applicable industry *Location Routing Number (LRN) Assignment Practices document (ATJS-0300065)*, Frontier must establish a unique LRN to identify the recipient switch or P01. Thus, Frontier must obtain an LRN for this new packet switch.
- Also pursuant to industry guidelines, only an NXX code holder can obtain an LRN, thus necessitating Frontier's request for an NXX code, for this rate center. (It should be noted, however, that Frontier would retain only a single thousand-number-block from the new NXX code.)
- On August 2, 2017, Frontier submitted the Thousands-Block Application Form to Neustar acting as the PA, for the Jackson rate center. *See Attachment*
- That same day (August 2, 2017), the PA denied the Application because Frontier did not meet the FCC's utilization requirement. Attached please find a copy of Frontier's Application and the PA's denial. *See Attachment*

Frontier has demonstrated a verifiable need. Frontier respectfully seeks the Commission's reversal of Neustar's decision and requests that the Commission direct Neustar to grant Frontier's application for additional numbering resources. Frontier respectfully requests that the Commission act upon this letter within ten (10) business days.

² *Number Resource Optimization*, Third Report and Order and Second Order on Reconsideration, FCC 01-362, 17 FCC Rcd 252, ¶ 64 (2001) ("*Third Report and Order*").

If you have any questions regarding this filing, please contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read 'C. Jo Anne Wessinger Hill', with a large, stylized flourish at the end.

C. Jo Anne Wessinger Hill

CJWH/tbj

Attachments (Application and PA's Denial)